IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

August 29, 2003
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In re Application of:	Caldwell et. al	OCT 2 2 2003
Serial No.	09/761,604	
Filed:	01/16/01	Technology Center 2100
For:	NATURAL LANGUAGE PRODUCT COMPARISON GUIDE SYNTHESIZER	
Examiner:	Alford W. Kindred	
Art Unit:	2177	
Attorney Docket No.:	CO2.2	

DECLARATION OF PRIOR INVENTION IN THE UNITED STATES TO OVERCOME CITED PATENT OR PUBLICATION (37 CFR 1.131)

HONORABLE COMMISSIONER OF PATENTS AND TRADEMARKS
Washington, D.C. 20231

PURPOSE OF DECLARATION

This declaration is to establish completion of the invention in this application in the United States at a date prior to October 18, 2000, which is the effective date of Shaya, et.al, US Published Patent Application 2002/161,664, the prior art publication which was cited by the Examiner in his office action dated June 4, 2003. This declaration is being made by all of the inventors in the present application: David E. Caldwell, Michael White, and Tanya Korelsky.

FACTS AND DOCUMENTARY EVIDENCE

The undersigned inventors hereby declare as follows:

1. We are the inventors of the present invention, embodied in US Patent Application 09/761,604, filed January 16, 2001, and entitled "Natural Language Product Guide Synthesizer".

2. The invention claimed in the present application, as amended in the Office Action response filed with this declaration, was conceived and reduced to practice at least as early as August, 2000.

3. Attached to this declaration as "Exhibit A" are copies of screen displays ("screenshots") showing the method of the invention in use in a prototype form. The screenshots

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represent computer displays created by a prototype system which was tested internally at
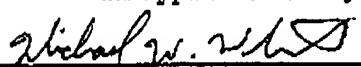Cogentex, Inc. the Assignee of the present application.

4. Specifically, these screenshots show:

   a. (Figure 1) A sample display from the prototype system, which displays over a computer
   network (via a web browser) a product comparison guide featuring dynamically
   generated fluent text that is used to convey product analyses and recommendations
   tailored to the user's requirements and preferences.

   b. (Figure 2) The text snippet database used to produce the display in Figure 1. The text
   snippets shown here function both as feature text snippets (referring to particular product
   features) and user profile text snippets (referring to particular user profiles).

5. Attached as "Exhibit B" is a screenshot showing file creation dates in August, 2000 for the
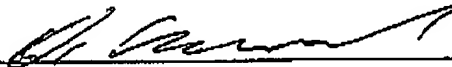   computer files which created the screenshots listed in 4(a)-(b) above.

6. From these screenshots it can be seen that the invention in this application was reduced to
   practice at least by the date of August of 2000, which is an earlier date than that of the
   effective date of the reference.

7. I hereby declare that all statements made herein of my own knowledge are true and that all
   statements made on information and belief are believed to be true; and further that these
   statements were made with the knowledge that willful false statements and the like so
   made are punishable by fine or imprisonment, or both, under Section 1001 of Title 18 of
   the United States Code, and that such willful false statements may jeopardize the validity
   of the application or any patent issued thereon.

Michael White

Date: August 28, 2003

David E. Caldwell

Date: Aug. 27 '03

Tanya Korelsky

Date: Aug. 27 '03

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